

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ROBERT P. GOODRICH,

Petitioner,

v.

TIM HALL,

Respondent.

Civil Action No. 03-12541-NG

**PETITIONER'S MOTION FOR ENLARGEMENT OF TIME
TO FILE MEMORANDUM IN SUPPORT OF ISSUANCE OF
WRIT OF HABEAS CORPUS AND TO ALTER BRIEFING SCHEDULE
(ASSENTED-TO)**

Petitioner Robert P. Goodrich ("Petitioner") hereby moves that the Court enlarge the time for filing his Memorandum in Support of Issuance of Writ of Habeas Corpus for an additional five business days, to and including Friday, July 30, 2004. Additionally, Petitioner moves that the remainder of the briefing schedule, which is triggered by the foregoing date, be similarly enlarged. Specifically, Petitioner moves that the Commonwealth's opposition be due on August 31, 2004, and that Petitioner's reply be due on September 30, 2004. As grounds therefor, Petitioner states that his counsel, Jill L. Brenner, Esq., who has undertaken the principal drafting responsibilities for this petition, has had a death in her family which has required her to travel unexpectedly to New Jersey for a funeral. Ms. Brenner, moreover, will be married in early September, which is the time when Petitioner's reply is presently due. The requested enlargement of the briefing schedule will allow counsel to attend to her family and personal obligations and provide her, thereafter, with additional time to comprehensively present Petitioner's arguments.

In further support of his motion, the Commonwealth has assented to the requested enlargement of the briefing schedule. Wherefore, Petitioner respectfully requests that the Court enlarge the briefing schedule as described above for good cause shown.

Respectfully submitted,

ROBERT P. GOODRICH,
By his attorneys,

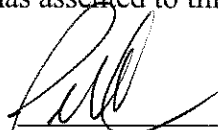


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Dated: July 22, 2004

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that on July 22, 2004, I conferred in good faith, via telephone, with Maura D. McLaughlin, Esq., counsel for Respondent, in an effort to narrow or resolve the issues raised in this motion, and counsel for Respondent has assented to this motion.



Peter E. Gelhaar